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एअर-इंडिया
AIR-INDIA

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**U.S DEPARTMENT OF TRANSPORTATION Dockets,
DOCKET NO. FAA-1999-5836, - 3 /
400 SEVENTH STREET SW.,
ROOM PLAZA 401,
WASHINGTON DC 20590.**

Reference: NPRM FAA-1999-5836; NOTICE NO.99-09.

Subject : COMMENTS ONPROPOSED FAR 145

Sir,

We are herewith enclosing our comments and look forward for its inclusion in the new FAR 145.

Thanking you
AIR INDIA


**V.M. SRIVASTAVA
GENERAL MANAGER-ENGG
QUALITY CONTROL & TECHNICAL SERVICES**



COMMENTS ON FAR 145 AMENDMENT

Reference is made to your NPRM FAA-199905836 Notice No 99-09 seeking our comments on the making of new FAR 145 REPAIR STATIONS.

FAR 145 covers requirements of Domestic Repair Stations and Foreign Repair Stations and our comments are restricted to the later.

As work done by Repair Stations, Commercial Operators or, Air Taxi Operators have ultimately the same implications on the airworthiness of the **aircraft** and safety of it's occupants, all Repair Stations must also be under the Management, Supervision and workmanship of personnel well experienced and qualified in the field of **aviation** and backed up with adequate technical literature, tooling and equipment needed to perform the job.

In this connection we refer to your Amendment 121-25 1 which introduces section 119 that consolidates requirements for operations under FAR 121 and 135.

We, concur with 125-251 amendment and &sire inclusion of same in the new FAR 145 in proposed Section 145.151 to cover Repair Stations like us which are National Air Carriers or Commercial Operators.

Amendment 121-251: Management Requirements **pertaining** to Director of **Maintenance/** Engineering **vide** proposed Section 119.67(c) and **119.71(e)** and Chief Inspector Section 119.67(d) , viz they must hold current Airframe **&** Powerplant ratings or its equivalent Licences issued by the Regulatory Authority of the Country and the experience requirements stated therein.

Requirements of FAR 121.378 **&** 127.139 Personnel, directly in-charge of maintenance are appropriately certificated, viz those in charge of **maintenance**, hold current and valid Airframe **&** Powerplant ratings or its equivalent Licences issued by the Regulatory **Authority** of the Country. Similarly those in charges of overhaul shops, hold current and valid repairman **certificates** or its equivalent qualifications issued by the Regulatory **Authority** of the **country**.

We feel that implementation of **above** requirements would ensure "quality production" as against "quantitative production" which has been the very aim of aircraft maintenance / overhaul / repair and thus, maintain a high standard of air worthiness.

Regarding Quality Assurance by **Internal Audits**, it is essential and appropriate to specify that Internal Audits be **performed** by personnel holding appropriate mechanic and or repairman certificates having long years of practical experience in the trade **concerned**, depending upon the scope of approval of the Repair Station and its capability.